

1 Benjamin Powell (SBN 214728)  
2 benjamin.powell@wilmerhale.com  
3 Daniel P. Kearney, Jr. (admitted *pro hac vice*)  
4 Philip R. Seybold (admitted *pro hac vice*)  
5 Seth Bastianelli (admitted *pro hac vice*)  
6 WILMER CUTLER PICKERING HALE & DORR LLP  
7 1875 Pennsylvania Avenue, NW  
8 Washington, D.C. 20006  
9 Telephone: (202) 663-6000  
10 Facsimile: (202) 663-6363

11 Charles V. Berwanger (SBN 047282)  
12 cberwanger@gordonrees.com  
13 GORDON & REES LLP  
14 101 W. Broadway, Suite 2000  
15 San Diego, CA 92101  
16 Telephone: (619) 696-6700  
17 Facsimile: (619) 696-7124

18 Attorneys for Defendant  
19 HANNAH GILES

20 UNITED STATES DISTRICT COURT  
21 SOUTHERN DISTRICT OF CALIFORNIA

22 JUAN CARLOS VERA

23 Plaintiff,

24 v.

25 JAMES O'KEEFE III, an individual  
26 HANNAH GILES, an individual, and  
27 DOES 1-20 inclusive,

28 Defendants.

Case No. CV 10-1422-L(MDD)  
Hon. M. James Lorenz

**DECLARATION OF DANIEL P.  
KEARNEY, JR.**

1 I, Daniel P. Kearney, Jr., hereby declare:

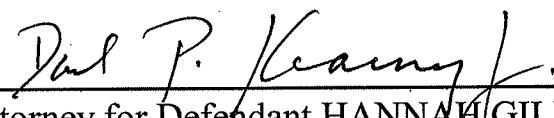
2 1. I am counsel in the law firm of Wilmer Cutler Pickering Hale & Dorr LLP.  
3 2. Attached hereto are true and correct copies of the following documents,  
4 which are submitted as exhibits in support of the REPLY IN SUPPORT OF  
5 DEFENDANT GILES'S MOTION FOR SUMMARY JUDGMENT, filed  
6 on June 4, 2012.

Ex. #	Document
1	Excerpts of Deposition of Hannah Giles, dated March 16, 2012.

10 Dated: June 4, 2012

11 Respectfully submitted,  
12 WILMER CUTLER PICKERING HALE &  
13 DORR LLP

14 By

  
15 Attorney for Defendant HANNAH GILES  
16 Email: daniel.kearney@wilmerhale.com